

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

**SYBIL ELIJAH, INDIVIDUALLY AND §
AS REPRESENTATIVE OF THE §
ESTATE OF DAVID ELIJAH, §
RAYFORD BROWN, INDIVIDUALLY §
AND AS REPRESENTATIVE OF THE §
ESTATE OF ELNORA BROWN, §**

Plaintiffs, §

vs. §

**PILGRIM'S PRIDE CORPORATION §
F/K/A PILGRIM'S INDUSTRIES, INC. §
AND PACKERS SANITATION §
SERVICES, LTD., §**

Defendants. §

CAUSE NO. 5:21-CV-00047-RWS

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
PLAINTIFFS' SECOND AMENDED COMPLAINT**

Plaintiffs Sybil Elijah and Rayford Brown file this Unopposed Motion for Extension of Time to File Plaintiffs' Second Amended Complaint.

I.

On March 3, 2023, this Court signed an order (Doc. 83) granting Plaintiffs leave to replead their claims against Pilgrim's Pride Corporation ("**Pilgrim's Pride**") and Packers Sanitation Services, Ltd. ("**PSSI**") and dismissing Plaintiffs' claims against the other defendant named in Plaintiffs' first amended complaint. The said order set a deadline of March 20, 2023 for Plaintiffs to file their second amended complaint.

II.

Plaintiffs' prior lead counsel, Jill Nicaud, is leaving her employment with Shrader & Associates, LLP, and will no longer be involved in this case. James Brunsting Hartle has or will soon appear as Plaintiffs' new lead counsel in this matter. Mr. Hartle will need additional time to transition the case and file the second amended complaint.

III.

Plaintiffs request a twenty-one day extension to file the second amended complaint. Plaintiffs have conferred with counsel for Pilgrim's Pride and PSSI, and these remaining Defendants are unopposed to the twenty-one day extension. Plaintiffs thus respectfully request that the Court reset the deadline for Plaintiffs to file their second amended complaint to April 10, 2023.

Respectfully submitted,

/s/ James Brunsting Hartle

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for the remaining Defendants, and that they have confirmed that they do not oppose this motion.

/s/ James Brunsting Hartle
James Brunsting Hartle

CERTIFICATE OF SERVICE

I hereby certify that this unopposed motion, with any and all attachments, has been electronically filed with the United States District Court for the Eastern District of Texas and that a copy was served on the other parties to this lawsuit by delivery, through the electronic filing system, to all counsel of record on this 14th day of March, 2023.

/s/ James Brunsting Hartle
James Brunsting Hartle